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7 Attorney for Christopher Biggers

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9 **UNITED STATES DISTRICT COURT**  
10 **DISTRICT OF NEVADA**

11 UNITED STATES OF AMERICA,

12 Plaintiff,

13 v.

14 CHRISTOPHER BIGGERS,

15 Defendant.

Case No. 2:21-mj-00774-EJY

**STIPULATION TO CONTINUE  
PRELIMINARY HEARING**  
(First Request)

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17 IT IS HEREBY STIPULATED AND AGREED, by and between Christopher Chiou,  
18 Acting United States Attorney, and Bianca R Pucci, Assistant United States Attorney, counsel  
19 for the United States of America, and Rene L. Valladares, Federal Public Defender, and  
20 Benjamin F. J. Nemec, Assistant Federal Public Defender, counsel for Christopher Biggers, that  
21 the Preliminary Hearing currently scheduled on October 4, 2021, be vacated and continued to  
22 a date and time convenient to the Court, but no sooner than thirty (30) days.

23 This Stipulation is entered into for the following reasons:

- 24 1. Parties have entered into pre-indictment negotiations and need additional time  
25 to resolve this matter.  
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1           2.     The government is in the process of preparing and producing discovery.  
2                 Counsel for the defendant will require additional time to review and investigate  
3                 discovery and meet with the client to discuss the details prior to proceeding.

4           2.     Defendant is incarcerated and does not object to a continuance

5           3.     Parties agree to the continuance.

6           4.     Additionally, denial of this request for continuance could result in a  
7 miscarriage of justice.

8           5.     The additional time requested by this stipulation is excludable in computing  
9 the time within which the defendant must be indicted and the trial herein must commence  
10 pursuant to the Speedy Trial Act, 18 U.S.C. §§ 3161(b) and 3161(h)(7)(A), considering the  
11 factors under 18 U.S.C. § 3161(h)(7)(B)(i) and (iv).

12           This is the first request for continuance filed herein.

13           DATED this 28<sup>th</sup> day of September 2021.

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15       RENE L. VALLADARES  
16       Federal Public Defender

CHRISTOPHER CHIOU  
Acting United States Attorney

17       By /s/ Benjamin F. J. Nemec

By /s/ Bianca R Pucci

18       BENJAMIN F. J. NEMEC  
19       Assistant Federal Public Defender

BIANCA R PUCCI  
Assistant United States Attorney

1 UNITED STATES DISTRICT COURT  
2 DISTRICT OF NEVADA

3 UNITED STATES OF AMERICA,

4 Plaintiff,

5 v.

6 CHRISTOPHER BIGGERS,

7 Defendant.  
8

Case No. 2:21-mj-00774-EJY

**ORDER**

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10 Based on the Stipulation of counsel and good cause appearing,  
11 IT IS THEREFORE ORDERED that the Preliminary Hearing currently scheduled on  
12 October 4, 2021 at the hour of 4:00 p.m., be vacated and continued to November 4, 2021 at  
13 the hour of 4:00 p.m., in Courtroom 3B.

14 DATED this 29th day of September 2021.

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17 UNITED STATES MAGISTRATE JUDGE  
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